JAP:SME

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

17 M 444

- -X

UNITED STATES OF AMERICA

- against -

JAVIER JERMAINE SIMPSON,

Defendant.

- -X

COMPLAINT

(21 U.S.C. §§ 952(a) and 960(b)(2)(B))

EASTERN DISTRICT OF NEW YORK, SS:

DANIEL SUDEN, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about May 14, 2017, within the Eastern District of New York and elsewhere, the defendant JAVIER JERMAINE SIMPSON did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance, in an amount of 500 grams or more.

(Title 21, United States Code, Sections 952(a) and 960(b)(2)(B)).

The source of your deponent's information and belief are as follows:[1]

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the investigation of numerous cases involving narcotics smuggling. I am familiar with the facts

---

[1] Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

and circumstances set forth below from my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. On May 14, 2017, the defendant JAVIER JERMAINE SIMPSON arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Delta Airlines flight 718 from Montego Bay, Jamaica.

3. Upon his arrival at JFK, the defendant JAVIER JERMAINE SIMPSON was selected for an enforcement examination by United States Customs and Border Protection ("CBP") officers.

4. CBP officers conducted a pat-down search of the defendant's body. CBP officers determined that the defendant JAVIER JERMAIN SIMPSON was wearing sneakers containing false bottoms. Inside the false bottom of each sneaker was a taped package.

5. Further inspection revealed that the packages contained a white powdery substance, which field-tested positive for cocaine. A total gross weight of approximately 870 grams of cocaine was seized.

WHEREFORE, your deponent respectfully requests that the defendant JAVIER JERMAINE SIMPSON be dealt with according to law.

Dated: Brooklyn, New York
May 15, 2017

S07506

DANIEL SUDEN
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
15th day of May, 2017

S/ Pohorelsky

THE HONORABLE VIKTOR V. POHORELSKY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK